

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

United States District Court  
Southern District of Texas  
FILED

CRIMINAL COMPLAINT

Ruben Alejandro Flores-Alcala *PRINCIPAL*

YOB: 1994

Mexico

JUN 23 2016

Case Number:

M-16-1202-M

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 21, 2016 in Starr County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Roger Ivan Hernandez-Hernandez and Cruz Sac-Sac, citizens of Guatemala, along with nine (9) other undocumented aliens, for a total of eleven (11), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Escobares, Texas to the point of arrest near Escobares, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On June 21, 2016, at approximately 6:15 pm, Border Patrol Agent J. Cole, who was working Alpha 5, (blimp mounted camera system) spotted a group of people running along Porteleza Avenue in Escobares, Texas. Portalez Avenue is approximately 150 yards north of the Rio Grande River, and is commonly used to pick up illegal aliens.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No
  
Signature of Complainant

Jon Chan Senior Patrol Agent

Printed Name of Complainant

Approved Torrey Leonard  
Sworn to before me and subscribed in my presence,

June 23, 2016

Date

at McAllen, Texas

City and State

Dorina Ramos, U. S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-16-1202-M**

**RE: Ruben Alejandro Flores-Alcala**

**CONTINUATION:**

**MATERIAL WITNESSES' STATEMENTS:**

Both material witnesses were read their rights. Both stated they were willing to provide statements without the presence of an attorney.

1- Roger Ivan Hernandez-Hernandez, a citizen of Guatemala, stated he illegally crossed the Rio Grande River. Hernandez told agents he was charged \$5,000 (USD) to be smuggled into the United States. After crossing the river, the foot guide told the group a vehicle would be waiting for them. When they arrived at a street, the guide told them to board the vehicle. According to Hernandez, he could not identify the driver's face, but did say that driver exited the van and started walking when he saw Border Patrol.

2- Cruz Sac-Sac, a citizen of Guatemala, stated he illegally entered the United States. Sac told agents he was charged \$5,000 (USD) to be smuggled into the United States. Sac stated he and the group followed a guide for approximately 25 minutes, until they reached a road. The guide then instructed them to board a large van-type vehicle that was there waiting for them. After the group boarded, the driver of the van drove for approximately 2 minutes before he abruptly stopped and exited the vehicle. Sac could not identify the driver's face due to how quickly everything happened.